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March 15, 2001

BY HAND

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Room TW-A325
Washington, D.C. 20554

RECEIVED

MAR 15 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte Presentation*
In the Matter of Provision of Directory Listing Information Under the
Telecommunications Act of 1934, As Amended, CC Docket No. 99-273 ,

Dear Ms. Salas:

On March 14, 2001, Peter Meyer, CEO of Telegate, Inc. ("Telegate"), John Celentano, President of Skyline Marketing Group, along with Ruth Milkman and Gil Strobel of Lawler, Metzger & Milkman, LLC, counsel for Telegate, met with Gregory Cooke, Rodney McDonald, Dennis Johnson, Pam Slipakoff and John Vu of the Common Carrier Bureau's Network Services Division to discuss the above-referenced proceeding.

During the meeting, we discussed the possibility of providing competitive directory assistance using uniform dialing codes. A copy of the presentation we used during the meeting is included with this submission. It provides a summary of the key points raised in our discussion.

Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. §1.1206(b)(1), an original and one copy of this letter are being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

Gil M. Strobela

Enclosure

cc: Gregory Cooke
Rodney McDonald
Dennis Johnson
Pam Slipakoff
John Vu

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2. 100 E

Competitive Directory Assistance via Uniform Codes

Presentation by **Telegate** Inc.

March 14, 2001

Currently, there is only limited competition for DA services

- **ILECs dominate the market through their control of 411**
 - The wide variety of access codes in the market today make it difficult for new entrants to market their services effectively
 - 411, 1+411, NPA-555-1212, 1+555-1212, 101-XXXX-0, 00
- **A uniform numbering scheme for DA providers will allow new entrants to differentiate themselves based on quality and array of services**
 - Competition will benefit consumers by promoting:
 - **Better service** – Competition will create pressure for DA providers to improve accuracy and response times
 - **More innovation** – New entrants are likely to introduce new value-added services, such as call completion, locator services, concierge services, etc.
 - **Increased focus on underserved markets** – New competitors may focus on niche opportunities such as language-specific DA

Development of Effective Competition Will Depend on Several Factors

- **Uniform numbering scheme**
 - Either a new scheme (e.g., N411-XXX) or an existing scheme (e.g., 101-XXXX)
 - There may not be enough 101X codes available to meet demand
 - FCC should seek comments on alternative schemes
- **Phase out of 411**
 - FCC should seek comment on appropriate timeframe for eliminating 411 and what transition should look like (e.g., content of recorded messages)
- **Mandatory deployment and phase-out deadlines**
 - Potential competitors need to get their services to market as rapidly as possible
 - FCC should seek comment on appropriate deadlines
 - May depend on which numbering scheme is adopted
 - May want to consider different deadlines for different geographic markets (LNP model)

Implementation Tradeoffs

**Choose Uniform
Numbering Scheme**

N411XXX

- Estimated \$10- \$20 million to develop switching software
- Lead time for software development

101XXXX

- No software development

Delayed Deployment

PROS

• No incremental cost for switch upgrades

CONS

• Could delay competition

Rapid Deployment

PROS

• Speed to Market

CONS

• Increased costs for switching upgrades

PROS

• Low implementation costs

• No timing issues

CONS

• Limited availability of 101X codes

• Increased chance of customer confusion

Telegate

The New Numbering Scheme will have Minimal Network Impact

